

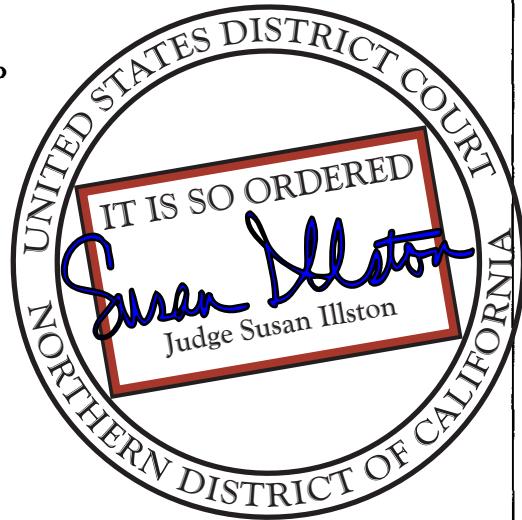
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

20 IN RE LCD-TFT (FLAT PANEL)) Master File No. M 07-1827 SI
21 ANTITRUST LITIGATION) MDL. No. 1827

1 **This Document Relates To:**

2 **All Indirect Purchaser Actions**

3) **ADMINISTRATIVE MOTION TO**
4) **REMOVE INCORRECTLY E-FILED**
5) **DOCUMENT NO. 374 AND ORDER**
6) **THEREON TO WITHDRAW SAID**
7) **DOCUMENT**

8) Local Rules 7.1 and F.R.C.P. 60
9)

10) Date: TBA

11) Time: TBA

12) Courtroom: 10

13 I, Ronald D. Foreman, declare that if called to testify in this matter that I would testify
14 as hereinafter stated:

15 1. I am one of the attorneys for the Plaintiffs in the above-entitled matter.

16 2. On Thursday, November 15, 2007, our office inadvertently filed the Bills of
17 Costs pursuant to Pretrial Order No. 3, Part II, with the Clerk of the Court for the Northern
18 District of California, San Francisco Division. The Bill of Costs should have been filed with
19 Jack W. Lee as Indirect Purchaser Interim Liaison Counsel, not the Clerk of the Court.

20 3. Upon learning of this error, we immediately notified the ECF Helpdesk at
21 ecfhelpdesk@candd.uscourts.gov to place a temporary lock on the document to prevent
22 access. In addition, we called the Clerk of the Court in Department 10 to confirm that the
23 temporary lock was placed on Docket No. 374. I then prepared this Administrative Motion to
24 Remove Incorrectly E-Filed Document No. 374 and Order Thereon to Withdraw Said
25 Document.

26 4. Good cause exists for the granting of this Administrative Motion For Relief
27 as the Bill of Costs were filed in error with the Court rather than with Interim Liaison
28 Counsel. The contents of the Bill of Costs reflect work that is protected by the work-product

privilege. The granting of this Motion will prevent the taking of undue advantage of an
adversary's industry and efforts through inappropriate disclosure.

3 5. By this Administrative Motion, it is respectfully requested that this Court
4 grant the requested relief and that Docket No. 374 be withdrawn.

I declare, under penalty of perjury under the laws of the State of California that the
foregoing is true and correct.

8 | Dated: November 15, 2007

FOREMAN & BRASSO

11 By: /s/
Ronald D. Foreman